

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SCOTT L. BAENA, LITIGATION TRUSTEE
OF THE LERNOUT & HAUSPIE SPEECH
PRODUCTS N.V. LITIGATION TRUST

Plaintiff,

- v -

KPMG LLP and KLYNVELD PEAT MARWICK
GOERDELER BEDRIJFSREVISOVEN,

Defendants.

Civil Action No. 04-12606 PBS

**ASSENTED TO MOTION TO ADMIT MICHAEL P. CARROLL,
DIEM-SUONG T. NGUYEN, MICHAEL S. FLYNN,
SEAN C. KNOWLES AND JULIAN J. MOORE PRO HAC VICE**

Pursuant to Local Rule 83.5.3(b), defendant KPMG LLP, through its counsel Kristin G. McGurn, a member of the Bar of the United States District Court for the District of Massachusetts, hereby moves the Court to admit Michael P. Carroll, Diem-Suong T. Nguyen, Michael S. Flynn, Sean C. Knowles and Julian J. Moore, pro hac vice. In support of this Motion, counsel states the following:

1. Mr. Carroll is a partner with the firm of Davis Polk & Wardwell, located at 450 Lexington Avenue, New York, New York 10017, and has been admitted to practice before the following courts in the years indicated:

District of Columbia (1983);
State of New York (1994); and
U.S. District Court, Southern District of New York (1997).

2. On information and belief, Mr. Carroll is a member in good standing of all courts to which he has been admitted; is eligible to practice before said courts; is not currently

suspended, disbarred, or the subject of any disciplinary proceeding in any jurisdiction; and is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

3. In accordance with Local Rule 83.5.3(b), attached to this motion is a Certificate signed by Mr. Carroll, which confirms the facts set forth in paragraphs 1 and 2 above.

4. Ms. Nguyen is counsel with the firm of Davis Polk & Wardwell, located at 1600 El Camino Real, Menlo Park, California 94025, and has been admitted to practice before the following courts in the years indicated:

State of New York (1996);
U.S. District Court, Southern District of New York (1996);
U.S. District Court, Eastern District of New York (2001); and
U.S. Court of Appeals, Fifth Circuit (1997).

5. On information and belief, Ms. Nguyen is a member in good standing of all courts to which she has been admitted; is eligible to practice before said courts; is not currently suspended, disbarred, or the subject of any disciplinary proceeding in any jurisdiction; and is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

6. In accordance with Local Rule 83.5.3(b), attached to this motion is a Certificate signed by Ms. Nguyen, which confirms the facts set forth in paragraphs 4 and 5 above.

7. Mr. Flynn is a partner with the firm of Davis Polk & Wardwell, located at 450 Lexington Avenue, New York, New York 10017, and has been admitted to practice before the following courts in the years indicated:

State of New York (1994);
U.S. District Court, Southern District of New York (1995); and
U.S. District Court, Eastern District of Michigan (1997).

8. On information and belief, Mr. Flynn is a member in good standing of all courts to which he has been admitted; is eligible to practice before said courts; is not currently suspended, disbarred, or the subject of any disciplinary proceeding in any jurisdiction; and is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

9. In accordance with Local Rule 83.5.3(b), attached to this motion is a Certificate signed by Mr. Flynn, which confirms the facts set forth in paragraphs 7 and 8 above.

10. Mr. Knowles is an associate with the firm of Davis Polk & Wardwell, located at 450 Lexington Avenue, New York, New York 10017, and has been admitted to practice before the following court in the year indicated:

State of New York (2000).

11. On information and belief, Mr. Knowles is a member in good standing of all courts to which he has been admitted; is eligible to practice before said courts; is not currently suspended, disbarred, or the subject of any disciplinary proceeding in any jurisdiction; and is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

12. In accordance with Local Rule 83.5.3(b), attached to this motion is a Certificate signed by Mr. Knowles, which confirms the facts set forth in paragraphs 10 and 11 above.

13. Mr. Moore is an associate with the firm of Davis Polk & Wardwell, located at 450 Lexington Avenue, New York, New York 10017, and has been admitted to practice before the following courts in the years indicated:

State of New York (2003);
U.S. District Court, Southern District of New York (2003); and
U.S. District Court, Eastern District of New York (2003).

14. On information and belief, Mr. Moore is a member in good standing of all courts to which he has been admitted; is eligible to practice before said courts; is not currently suspended, disbarred, or the subject of any disciplinary proceeding in any jurisdiction; and is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

15. In accordance with Local Rule 83.5.3(b), attached to this motion is a Certificate signed by Mr. Moore, which confirms the facts set forth in paragraphs 13 and 14 above.

WHEREFORE, KPMG LLP respectfully moves that Michael P. Carroll, Diem-Suong T. Nguyen, Michael S. Flynn, Sean C. Knowles and Julian J. Moore, be permitted to appear and practice before this Court in the above captioned matter. Payment of the requisite fee has been submitted to the Clerk of the Court.

Dated: January 25, 2005

Respectfully submitted,

KPMG LLP,

/s/ Kristin G. McGurn
Kevin J. Lesinski (BBO #554140)
Kristin G. McGurn (BBO #559687)
SEYFARTH SHAW LLP
World Trade Center East
Two Seaport Lane, Suite 300
Boston, MA 02210
(617) 946-4800

CERTIFICATE PURSUANT TO LOCAL RULE 7.1(A)(2)

Undersigned counsel for KPMG LLP hereby certifies that she has conferred in good faith with Plaintiff's counsel, David Trench, Esq., and, on behalf of the Plaintiff, he confirmed his assent to this Motion.

/s/ Kristin G. McGurn

Certificate of Service

I hereby certify that a true copy of the above document was served upon the attorney of record for each party electronically and by first-class mail on January 25, 2005.

/s/ Kristin G. McGurn

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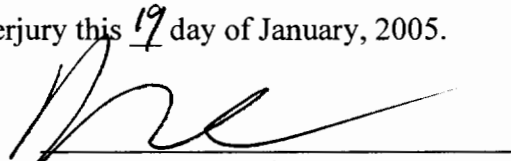
Civil Action No. 04-12606 PBS

CERTIFICATE OF MICHAEL P. CARROLL
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

Michael P. Carroll, duly sworn on oath states as follows:

1. I am a partner with the firm Davis Polk & Wardwell, which is located at 450 Lexington Avenue, New York, New York 10017.
2. I have been admitted to practice before the following courts in the years indicated:
District of Columbia (1983);
State of New York (1994); and
U.S. District Court, Southern District of New York (1997).
3. I am an attorney in good standing and eligible to practice in the above-referenced courts. I have not been suspended or disbarred in any jurisdiction, and no disciplinary actions are pending against me.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 19 day of January, 2005.


Michael P. Carroll

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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Defendants.

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CERTIFICATE OF DIEM-SUONG T. NGUYEN
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

Diem-Suong T. Nguyen, duly sworn on oath states as follows:

1. I am Counsel with the firm Davis Polk & Wardwell, which is located at 1600 El Camino Real, Menlo Park, California 94025.
2. I have been admitted to practice before the following courts in the years indicated:

State of New York (1996);
U.S. District Court, Southern District of New York (1996);
U.S. District Court, Eastern District of New York (2001); and
U.S. Court of Appeals, Fifth Circuit (1997).
3. I am attorney in good standing and eligible to practice in the above-referenced courts. I have not been suspended or disbarred in any jurisdiction, and no disciplinary actions are pending against me.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 18 day of January, 2005.


Diem-Suong T. Nguyen

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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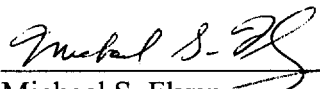
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CERTIFICATE OF MICHAEL S. FLYNN
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

Michael S. Flynn, duly sworn on oath states as follows:

1. I am a partner with the firm Davis Polk & Wardwell, which is located at 450 Lexington Avenue, New York, New York 10017.
2. I have been admitted to practice before the following courts in the years indicated:
State of New York (1994);
U.S. District Court, Southern District of New York (1995); and
U.S. District Court, Eastern District of Michigan (1997).
3. I am an attorney in good standing and eligible to practice in the above-referenced courts. I have not been suspended or disbarred in any jurisdiction, and no disciplinary actions are pending against me.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 10 day of January, 2005.


Michael S. Flynn

UNITED STATES DISTRICT COURT
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CERTIFICATE OF SEAN C. KNOWLES
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

Sean C. Knowles, duly sworn on oath states as follows:

1. I am an associate with the firm Davis Polk & Wardwell, which is located at 450 Lexington Avenue, New York, New York 10017.


2. I have been admitted to practice before the following court in the year indicated:

State of New York (2000).

3. I am an attorney in good standing and eligible to practice in the above-referenced courts. I have not been suspended or disbarred in any jurisdiction, and no disciplinary actions are pending against me.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 19 day of January, 2005.


Sean C. Knowles

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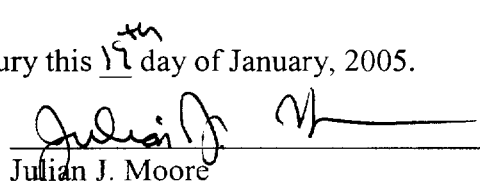
CERTIFICATE OF JULIAN J. MOORE
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

Julian J. Moore, duly sworn on oath states as follows:

1. I am an associate with the firm Davis Polk & Wardwell, which is located at 450 Lexington Avenue, New York, New York 10017.
2. I have been admitted to practice before the following courts in the years indicated:

State of New York (2003);
U.S. District Court, Southern District of New York (2003); and
U.S. District Court, Eastern District of New York (2003).
3. I am an attorney in good standing and eligible to practice in the above-referenced courts. I have not been suspended or disbarred in any jurisdiction, and no disciplinary actions are pending against me.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this th17 day of January, 2005.


Julian J. Moore